

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SUE BROWN, ANN JOHNSON, and MARY
DAVIS, on behalf of themselves and all others
similarly situated,

Plaintiffs,

- against -

THE CITY OF NEW YORK,

ANTHONY J. ANNUCCI, Acting Commissioner of the
New York State Department of Corrections and
Community Supervision,

JASON EFFMAN, Associate Commissioner and PREA
Coordinator for the New York State Department of
Corrections and Community Supervision,

STEVEN MAHER, Chief of Investigations, Office of
Special Investigations, New York State Department of
Corrections and Community Supervision,

CHRISTIAN NUNEZ, Deputy Chief of the Sex Crimes
Division, Office of Special Investigations, New York
State Department of Corrections and Community
Supervision,

JOHN SHIPLEY, Director, Bureau of Labor Relations,
New York State Department of Corrections and
Community Supervision,

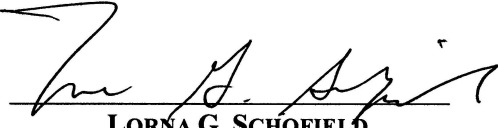
SABINA KAPLAN, Superintendent of Bedford Hills
Correctional Facility,

MICHAEL DAYE, Deputy Superintendent for Security at
Bedford Hills Correctional Facility,

ELAINE VELEZ, Assistant Deputy Superintendent and
PREA Compliance Manager at Bedford Hills Correctional
Facility,

Motion DENIED without prejudice to
renewal for failure to comply with Individual
Rule III.A.I. If Plaintiffs seek to renew their
motion, they shall file a letter motion in
accordance with Individual Rule III.A.1 by
December 23, 2021.

Dated: December 21, 2021
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

No. 1:21-CV-10492
(LGS) (KP)

**NOTICE OF
PLAINTIFFS' MOTION
FOR LEAVE TO
PROCEED
ANONYMOUSLY**

CORRECTION OFFICER A, Bedford Hills Correctional Facility,

CORRECTION OFFICER B, Bedford Hills Correctional Facility,

CORRECTION OFFICER C, Bedford Hills Correctional Facility,

CORRECTION OFFICER D, Bedford Hills Correctional Facility,

CORRECTION OFFICER E, Bedford Hills Correctional Facility,

CORRECTION OFFICER F, Bedford Hills Correctional Facility,

CORRECTION OFFICERS JANE JONES #1-17,
Bedford Hills Correctional Facility (True Names Being
Presently Unknown and Fictitious to Plaintiffs),

CORRECTION OFFICERS JOHN JONES #1-15,
Bedford Hills Correctional Facility (True Names Being
Presently Unknown and Fictitious to Plaintiffs),

Defendants.

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Plaintiffs, SUE BROWN, ANN JOHNSON, and MARY DAVIS, on behalf of themselves and all others similarly situated, by and through their attorneys, The Aboushi Law Firm, PLLC, as and for their Complaint, move this Court as follows:

Upon the accompanying Memorandum of Law and the unredacted and highlighted Complaint attached to the Motion as Exhibit A and filed under seal, and in redacted form for public filing as Exhibit B, Plaintiffs Sue Brown, Ann Johnson, and Mary Davis, hereby move the Court to permit them to file their Complaint in redacted form for public filing, to permit the parties to file all other public filings anonymously by using the pseudonyms reflected in the redacted caption of this Case; and to allow the Complaint and all other filings in this

matter—to the extent they reveal the identity of the Plaintiffs or Department of Corrections and Community Supervision (“DOCCS”) staff described in the Complaint (apart from the supervisory Defendants identified by name in the caption of this motion)—to be filed under seal. Plaintiffs further request the Court to order that Defendants, who will be served with a non-anonymous version of the Complaint, in addition to the public version, not disclose the identity of Plaintiffs Sue Brown, Ann Johnson, and Mary Davis and DOCCS staff proceeding under pseudonyms to a third party unless, on motion by either party, the District Court Judge to whom this matter is assigned determines otherwise. A proposed order is attached hereto as Exhibit C. Plaintiffs previously moved for leave to file under seal and the motion was temporarily granted. The December 8, 2021 temporary Order granting that motion is attached hereto as Exhibit D. An appendix with parties permitted to view the sealed filing is attached hereto as Exhibit E.

Dated: December 17, 2021

Respectfully submitted,

THE ABOUSHI LAW FIRM, PLLC

A handwritten signature in black ink, appearing to read "Tahanie A. Aboushi", enclosed within a rectangular border.

By: _____
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